# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

Rinne Corp,

Plaintiff.

v.

Case No. 1:23-cv-16232

The Partnerships, and Unincorporated Associations Identified in Schedule A,

Defendants.

Honorable Judge Jeffrey I. Cummings

#### **DECLARATION OF XIN CHEN**

- I, Xin Chen, declare as follows:
- 1. I am an employee of Larryhot Trading Co., Ltd. (Larryhot), which operates the internet stores, costumebrand.com and flowercog.com (the **Stores**), identified in this lawsuit. In this capacity, I have personal knowledge of the Stores' operation and sales and have access to Larryhot's business records.
- 2. I make this declaration based on my personal knowledge and after reviewing Larryhot's business records. If called as a witness, I can competently testify to the matters stated herein.
- 3. Larryhot is incorporated and has its principal place of business in China. Larryhot operates the Stores exclusively in China. Larryhot has never owned or utilized an office, hired employees, agents, or representatives, maintained bank accounts, owned assets or properties, or qualified to do business in Illinois or any other part of the United States.
- 4. Neither the Stores nor Larryhot has targeted Illinois residents with their advertisements, nor directed any marketing efforts or materials at Illinois.

- 5. Rinne Corp (the **Plaintiff**) alleges the Store has infringed on its copyrights and trademarks. Specifically, Plaintiff's counsel has provided the attached **Exhibit A**, which shows the allegedly infringing products (collectively, **Alleged Products**).
- 6. After reviewing the complaint and Exhibit A provided by counsel, I conducted a diligent search of the Stores' sales records for the Alleged Products. **Exhibit B** contains complete and accurate sales records, maintained in the ordinary course of Larryhot's business.
  - 7. Exhibit B shows that the Stores have made no sale of the Alleged Products in the U.S.
  - 8. The Stores have not received summons of this lawsuit at their email addresses.
- 9. There are many similar mousetrap products for sale online. A brief search reveals numerous similar pictures and sales links for such products. Many listings use product descriptions of "flip and slide." *See* Exhibit C.
- 10. Before this litigation, the Stores were not aware, nor had any reason to be aware, that they could be infringing any copyrights or trademarks. The Stores have not attempted to market or pass off their products as those of the Plaintiff or any other party.
- 11. The Stores use the Paypal accounts, Rnalemoa@outlook.com and RnalemoaBtn@outlook.com, for the Alleged Products, which have a total frozen amount of \$1,271,693.18 due to the asset restraints imposed by this litigation.
- 12. The Stores still plan to continue business operations. However, the existing restraints significantly hinder the Stores' liquidity and ability to maintain normal operations.
- 13. Upon notice of the current litigation (not through service of summons), Larryhot has permanently removed the listings of the Alleged Products. While Larryhot is moving to challenge the Preliminary Injunction Order (Dkt. 41), Larryhot assures the court it will not relist the Alleged Products for sale until further ordered by the court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and accurate.

[The remainder of this page is intentionally left blank.]

Executed on this 27th day of May, 2024, in Xiamen, Fujian, China.

Dated: May 27, 2024

By: Xin Chen

Xin Chen

# **EXHIBIT A**



♥Free Shipping Over \$39.99 ♥Worldwide Delivery♥

**hot** sale Kitchen & Bath Tools ALL PRODUCTS

CostumeBrand

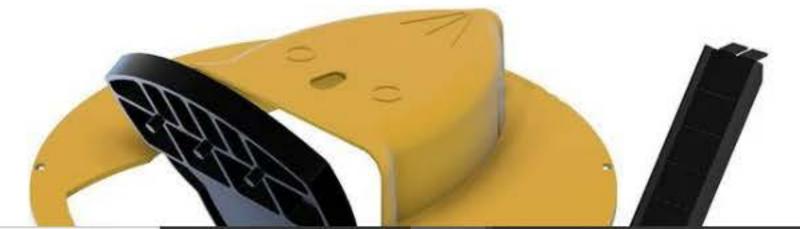


Home / Flip N Slide Bucket Lid Mouse Tr...

a costumebrand.com/products/-buy-2-free-shipping-flip-n-slide-bucket-lid-mouse-trap

# What's Included







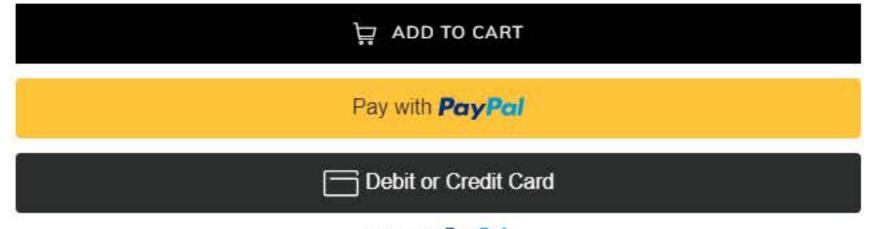
\$19.90 \$35.80



#### Quantity



- 36 visitors currently looking at this product
- ⊕ ♦ SHIPPING WORLDWIDE
- 🖒 🔥 It's been recommended by 1982 people on Facebook, Twitter and Instagram
- Secure Payments Via PayPal® and CreditCard



Powered by PayPal

- Buy 2 Get Extra 5% OFF
- Buy 3 Get Extra 10% OFF

♥Free Shipping Over \$39.99 ♥Worldwide Delivery♥

a costumebrand.com/products/-buy-2-free-shipping-flip-n-slide-bucket-lid-mouse-trap









ALL PRODUCTS

Kitchen & Bath Tools

**hot** sale









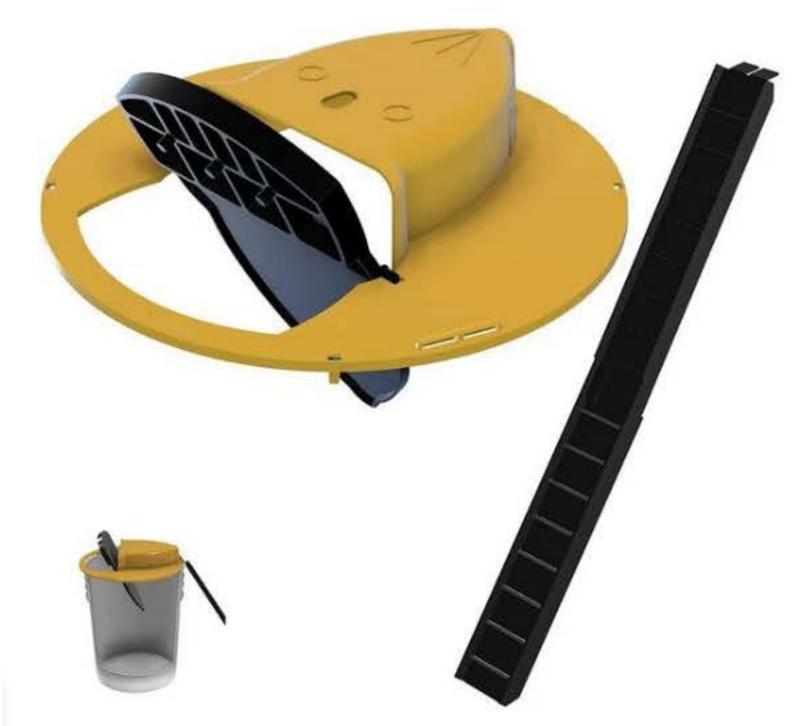


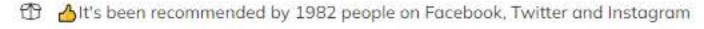




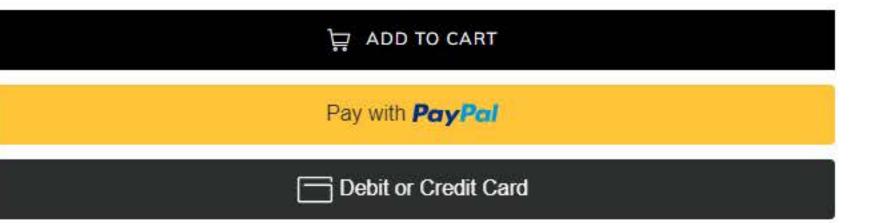












Powered by PayPal

- Buy 2 Get Extra 5% OFF
- Buy 3 Get Extra 10% OFF

(No need to use promotional codes, the system will automatically reduce the price after adding to the shopping cart.)



- 91.2% Of Customers Are Buying 2 Pcs Or More
- 100% Money Back Guarantee.
- Secure Payments Via PayPal® and CreditCard.
- SSL Certificates For 100% Security.

# LIMITED STOCK - ACT FAST!

The merchant guarantees delivery within 24 hours!

Over time, a full refund!



Recently purchased How This Tran Works











ALL PRODUCTS

Kitchen & Bath Tools

hot sale













·Inhumane: Glue Traps take days for a mouse to eventually die of hunger, stress, or dehydration.

· Unsanitary: The CDC has warned against the use of these traps due to the threat of the deadly disease "The hantavirus"



· Unsanitary: Picking up a dead mouse that has been crushed poses many risks of disease.

 Unsafe: There have been hundreds of cases where a family pet or a child has been very badly injured from this style trap.

· Not efficient : With any snap trap design you can only catch 1 mouse at a time.



PATENT AND TRADEMARK OFFICE

Product information:

medium sized rats

getting close to the mess.

Dimensions: 12 x 12 x 3 inches

# Packaging includes:

1\*Flip N' Slide Bucket Lid

• Item Weight: 14 ounces

- 1\*Flip N' Slide Counter Weighted Plank
- 2 Piece Ramp
- 1\*Instructional Guide





• O Sanitary - No more having to dispose of dirty corpses from a glue or snap trap, which can

• Mice/Young Rats - Our trap has the unique capability to catch both mice and small to

WUTILITY PATENT PENDING: Our product is filed for a utility patent by the UNITED STATES

potentially infect you with a deadly disease. Now simply release/dispose of the mice/rats without

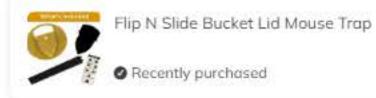








PACKING & SHIPPING



ADD TO CART

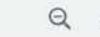
Flip N Slide Bucket Lid Mouse Tr... \$19.90 \$35.80

Quantity







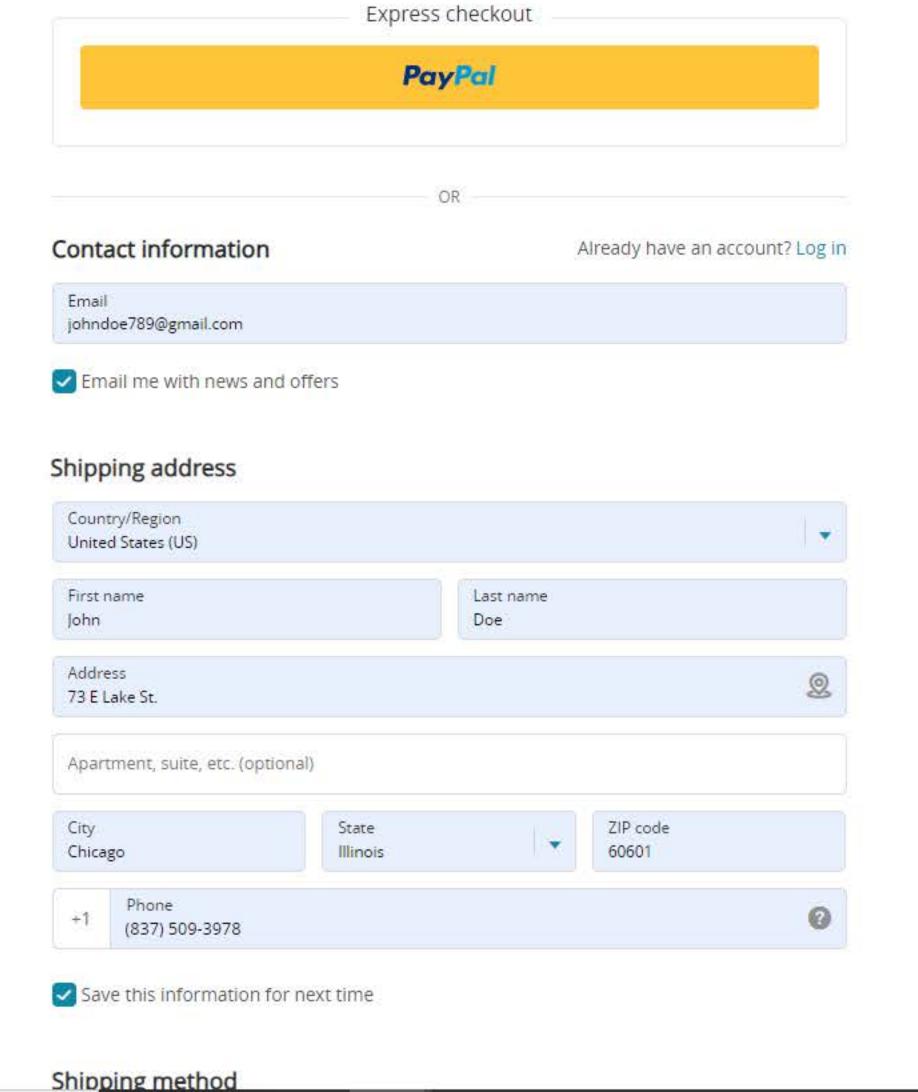


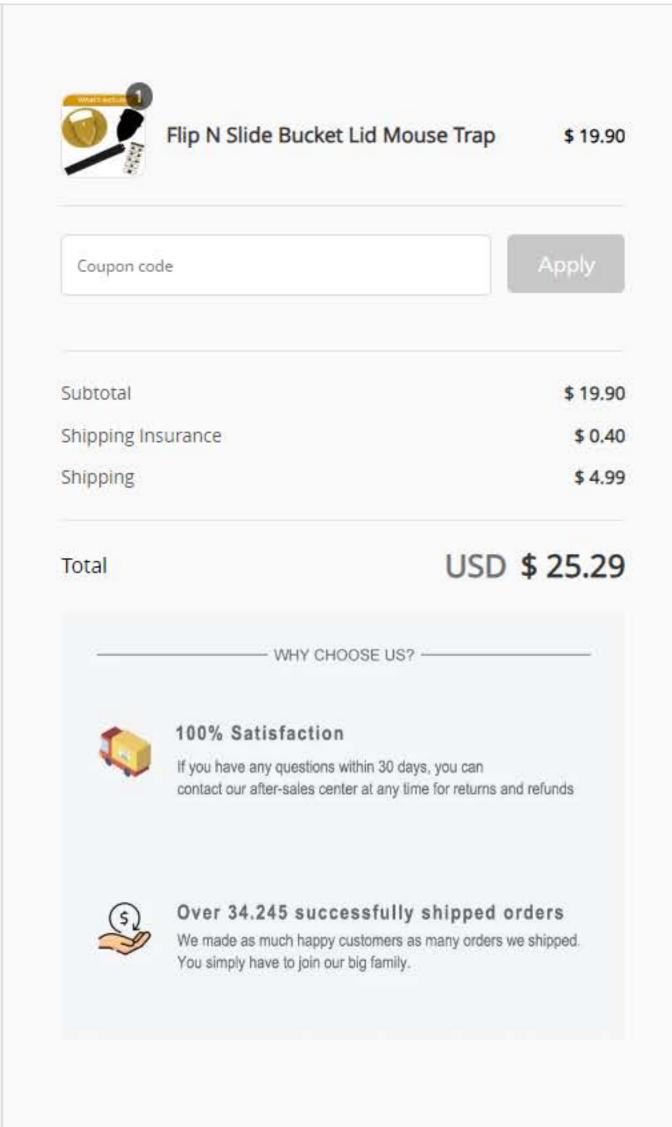






# costumebrand





All products

Decoration Sale 

 Sale 

 Decoration Sale 

 De

flowercog.com/products/bucket-lid-mouse-trap?variant=81028

















USD 🗸

### USD \$24.99 USD \$49.98 Save 50%

- 2.6K Sold
- 4.2K people are viewing this right now



## Style



# Save \$ 25 Get 4Pcs Free shipping

### Quantity



- 124 visitors currently looking at this product
- Authority: patented products
- Customer service: 24 hours online communication
- Payment security: paypal & Damp; Credit card security
- Fast shipping: Enjoy Free Express Shipping on orders over \$50

ADD TO CART



# flowercog.com/products/bucket-lid-mouse-trap?variant=81028



#### All products











- ·Inhumane: Glue Traps take days for a mouse to eventually die of hunger, stress, or dehydration.
- · Unsanitary: The CDC has warned against the use of these traps due to the threat of the deadly disease "The hantavirus"



- · Unsanitary: Picking up a dead mouse that has been crushed poses many risks of disease.
- · Unsafe: There have been hundreds of cases where a family pet or a child has been very badly injured from this style trap.
- · Not efficient : With any snap trap design you can only catch 1 mouse at a time.











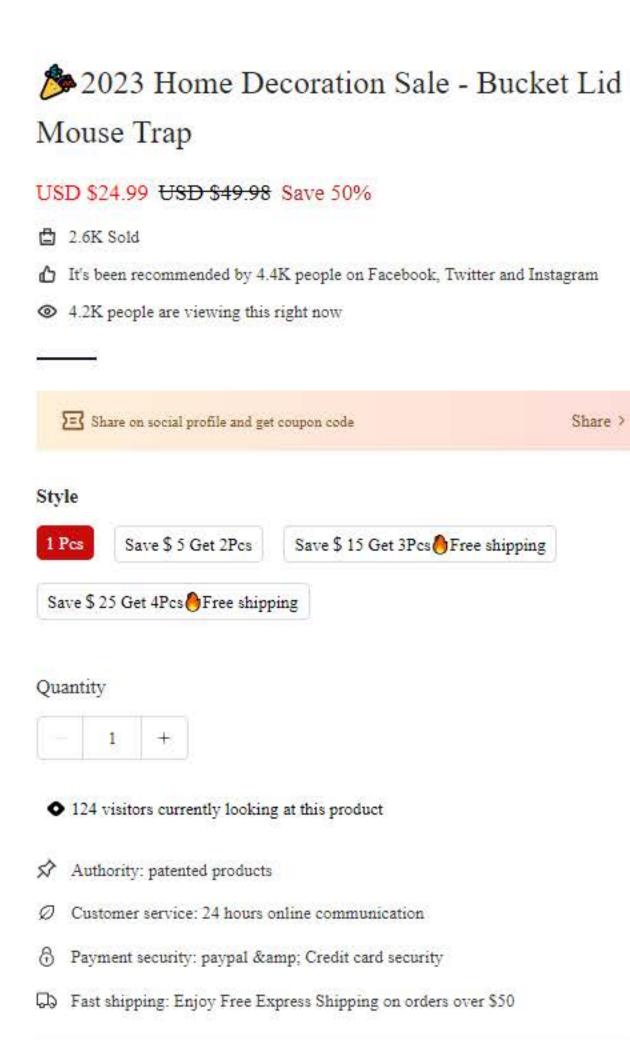












ADD TO CART

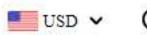






### All products









# Where To Use This Trap?















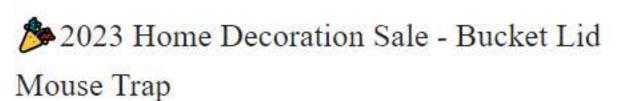












## USD \$24.99 USD \$49.98 Save 50%

- 2.6K Sold
- ⚠ It's been recommended by 4.4K people on Facebook, Twitter and Instagram
- ◆ 4.2K people are viewing this right now.



Share >

## Style



Save \$ 25 Get 4Pcs Free shipping

### Quantity



- ◆ 124 visitors currently looking at this product
- Authority: patented products
- O Customer service: 24 hours online communication
- Payment security: paypal & Damp; Credit card security
- Fast shipping: Enjoy Free Express Shipping on orders over \$50

ADD TO CART







flowercog.com/products/bucket-lid-mouse-trap?variant=81028











All products

























# Mouse Trap

### USD \$24.99 USD \$49.98 Save 50%

- 2.6K Sold
- ⚠ It's been recommended by 4.4K people on Facebook, Twitter and Instagram
- 4.2K people are viewing this right now



Share >

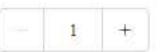
## Style



Save \$ 15 Get 3Pcs Free shipping

# Save \$ 25 Get 4Pcs Free shipping

## Quantity



- 124 visitors currently looking at this product
- Authority: patented products
- O Customer service: 24 hours online communication
- Payment security: paypal & Damp; Credit card security
- Fast shipping: Enjoy Free Express Shipping on orders over \$50

ADD TO CART

flowercog.com/products/bucket-lid-mouse-trap?variant=81028







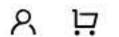




All products



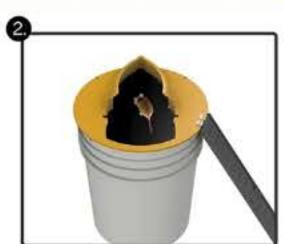








Mice climb the provided ramp toward the bait located inside of the tunnel



Mice will inch out onto the counter weighted platform to eat the bait

# NOTE: BUCKET NOT INCLUDED



The mouses weight will trigger the platform to fall forward



The platform will then automatically reset for the next mouse





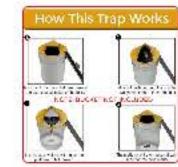






2023 Home Decoration Sale - Bucket Lid

Mouse Trap







# 2023 Home Decoration Sale - Bucket Lid Mouse Trap

# USD \$24.99 USD \$49.98 Save 50%

- 2.6K Sold
- ⚠ It's been recommended by 4.4K people on Facebook, Twitter and Instagram
- 4.2K people are viewing this right now

Share on social profile and get coupon code

Share >

## Style



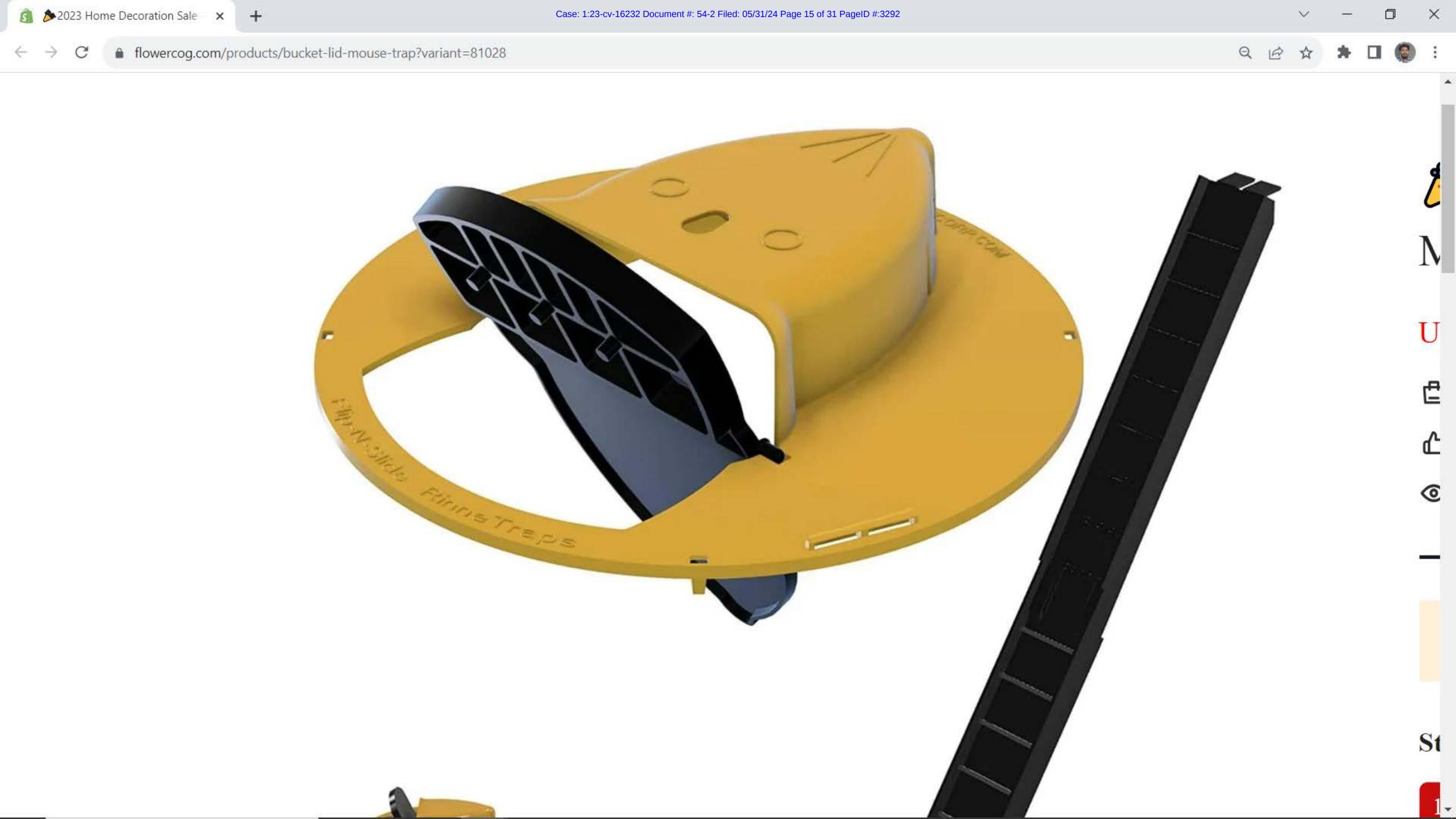
Save \$ 25 Get 4Pcs Free shipping

### Quantity



- 124 visitors currently looking at this product
- Authority: patented products
- Customer service: 24 hours online communication
- Payment security: paypal & Damp; Credit card security
- Fast shipping: Enjoy Free Express Shipping on orders over \$50

ADD TO CART



flowercog.com/products/bucket-lid-mouse-trap?variant=81028











All products



























🏂 2023 Home Decoration Sale - Bucket Lid

Mouse Trap

K\*\*\*5









2023 Home Decoration Sale - Bucket Lid

Mouse Trap

## USD \$24.99 USD \$49.98 Save 50%

- 2.6K Sold
- ⚠ It's been recommended by 4.4K people on Facebook, Twitter and Instagram
- ◆ 4.2K people are viewing this right now.



Share >

## Style



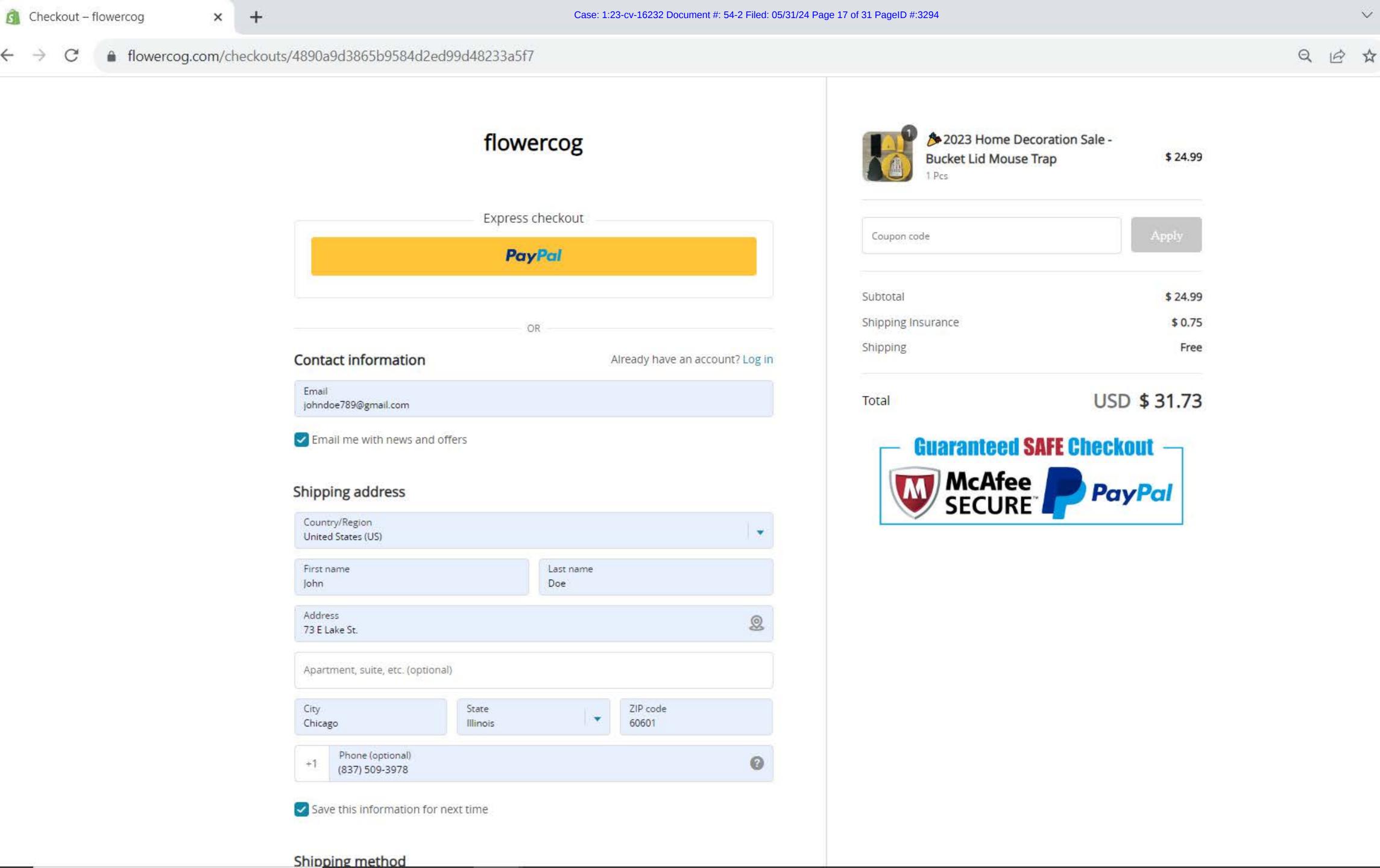
Save \$ 25 Get 4Pcs Free shipping

### Quantity

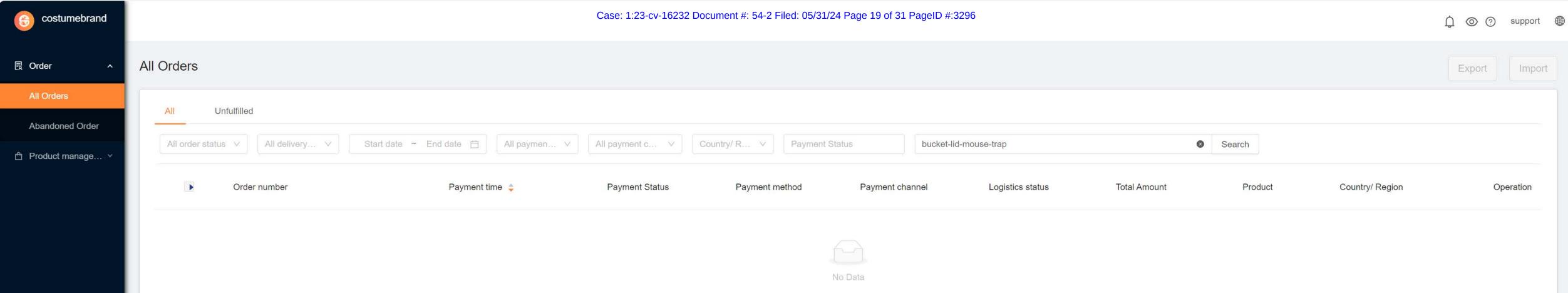


- ◆ 124 visitors currently looking at this product
- Authority: patented products
- Customer service: 24 hours online communication
- Payment security: paypal & Damp; Credit card security
- Fast shipping: Enjoy Free Express Shipping on orders over \$50

ADD TO CART



# EXHIBIT B

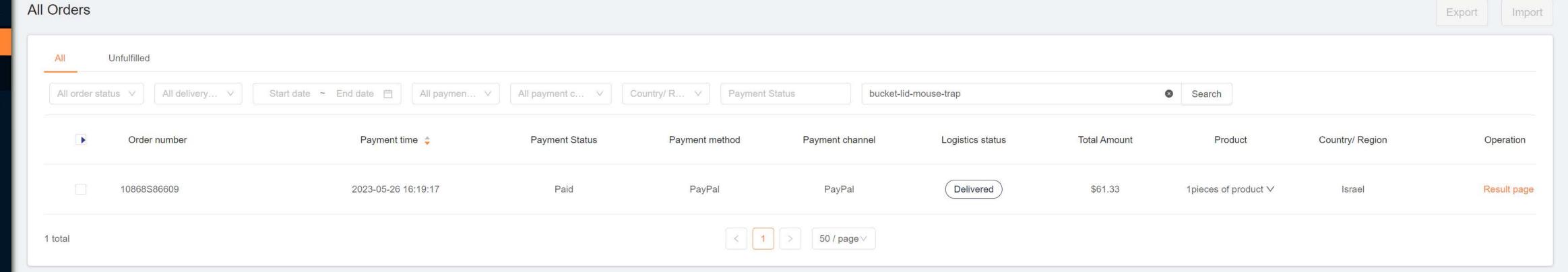


< 0 > 50 / page ∨

0 total

#### All Orders

Abandoned Order



# **EXHIBIT C**

Memorial Day: up

Amazon Home

Medical Care - Groceries -

Shop by Room

Garden & Outdoor ▼ Search Amazon

Discover

Best Sellers Amazon Basics New Releases Prime Music Customer Service Today's Deals Amazon Home Registry Books Pharmacy Gift Cards Luxury Stores Smart Home Fashion Sell Toys & Games Find a Gift Automotive Computers Coupons

Home Décor

Furniture

Kitchen & Dining

Bed & Bath

Hello, sign in
Account & Lists •

Garden & Outdoor

& Orders

Kat Sense: Your Department of Defense

KAT SENSE

**★★★☆** 6,882 \$17<sup>96</sup> \$19.96 √prime



#### Customers who viewed this item also viewed

Shop by Style



Pack 2 Bucket Lid Mouse Trap, 5 Gallon Bucket Compatible, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor (Wine)

★★★☆☆ 49



Pack 3 Bucket Lid Mouse Rat Trap, Mouse Catching Tool, Trap Door Style, Multi Catch, Auto Reset, Indoor Outdoor, 5 Gallon Bucket Compatible

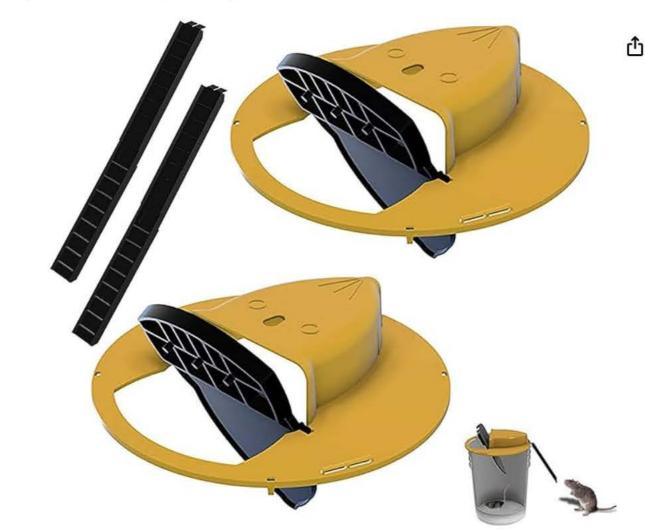
★★★☆☆ 7

\$2399 (\$8.00/Count)



Arber Traps Bucket Lid Mouse Trap, Fits on 5 Gallon + 12 Pcs Sticky Mouse Traps Glue + 6 Pcs Spring Snap Traps for Mice - Multi Catch Human... ★★★☆☆ 38

Patio, Lawn & Garden > Pest Control > Traps



Roll over image to zoom in

















2 Pack Mice Mouse Trap Bucket Flip Lid, Bucket Lid Mouse Rat Trap Indoor Outdoor, Humane Mouse Trap, Mouse Catching Tool Auto Reset, 5 Gallon Bucket Compatible (Without Barrel)

Brand: KUWSEIY

3.1 ★★★☆☆ × 24 ratings

100+ bought in past month

\$1299 (\$6.50 / Count)

Get Fast, Free Shipping with Amazon Prime FREE Returns Y

Get \$10 off instantly: Pay \$2.99 \$12.99 upon approval for the Amazon Store Card. No annual fee.

**KUWSEIY** 2 Pack Color Modern Style Material Plastic

Product 12.17"L x 12.17"W x 2.99"H

**Dimensions** Number of Pieces 1

✓ See more

#### About this item

- [Bucket Mouse Trap] Automatically resets and holds upwards of 10 mice and 5+ medium-sized Rats. Unlike conventional mouse trap bucket lid which only catches 1 or 2. The test concluded that the multi-catch traps by almost 4x. [5 Gallon Bucket is NOT included]
- [Pet/Children Friendly] Stop purchasing traditional mouse trap which can harm your family pet or even worse harm your children. Our humane mouse trap is 100% safe, please feel free to use it.
- [Easy To Use] Only snap it onto a standard-sized 5 gallon bucket mouse trap and boom your catching mice and rats. Now simple release of the mice far away from your house.

prime

Enjoy fast, free delivery, exclusive deals, and awardwinning movies & TV shows with Prime

Try Prime and start saving today with fast, free delivery



**Buy Now** 

Amazon

Payment Secure transaction

Add a nift receipt for each

KUWSEIY

Eligible for Return, Refund or Replacement

within 30 days of receipt

Ships from

Sold by

© Update location amazon

Shop by Room

Amazon Home

Garden & Outdoor - Search Amazon

Discover

Shop by Style

Home Décor

= All Medical Care - Groceries - Best Sellers Amazon Basics New Releases Prime - Music Customer Service Today's Deals Amazon Home Registry Books Pharmacy Gift Cards - Luxury Stores Smart Home Fashion Sell Toys & Games Find a Gift Automotive Computers

**Furniture** 

Kitchen & Dining

Bed & Bath

EN.

Garden & Outdoor

Hello, sign in
Account & Lists -Returns & Orders

**Celebrate National Small Busin** 

Raid Essentials Flying Insect Light Trap Refills, 2 Light Trap Refill... ★★★★☆ 2,243

Save 5% more with Subscribe & Save

Shop now

Patio, Lawn & Garden > Pest Control > Traps



Roll over image to zoom in













Mouse Trap, Flip and Slide Bucket Lid Mice Rat Trap, for Indoor Outdoor Multi Catch Auto Reset (Size : Black)

Brand: SnOwky

\$3689

Get \$10 off instantly: Pay \$26.89 \$36.89 upon approval for the Amazon Store Card. No annual fee.

#### Size: Black

Black Yellow White \$36.89 \$36.89 \$36.89 \$36.89

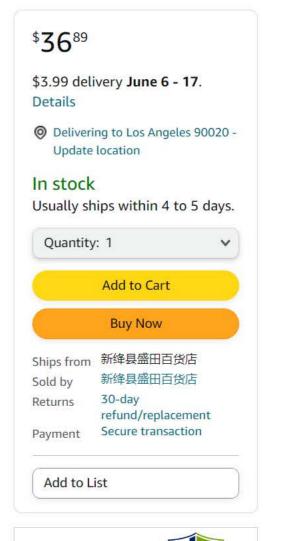
Brand SnOwky Color One Color 516 Grams **Item Weight** Number of Pieces 1

#### About this item

- [Special Designed] This trap was designed with the intent to be used in a catch and release style, but it is optionable to fill the bucket up with water to
- [Cleaner than ever] No more need to discard dirty mice with glue or traps, which can infect them with a deadly disease. Now, just release/dispose of the mouse without having to go anywhere near the mess.
- [Easy to use] All you have to do is clip it into a standard size 5-gallon bucket and use it to catch rats and mice. No longer handle single-use traps, which are often ineffective and unhygienic.
- [Family Friendly] Stop purchasing traditional mouse traps which can harm your family pet or even worse... your children. Our mouse trap is 100% safe .
- [Reasonable use] We can spread peanut butter in the tunnel of the mousetrap, and the mouse will follow the smell into the tunnel, and fall back into the bucket without getting the peanut butter.

Report an issue with this product or seller







**HECO ARMOR** 

**Hanging Wasps** 

Outdoor

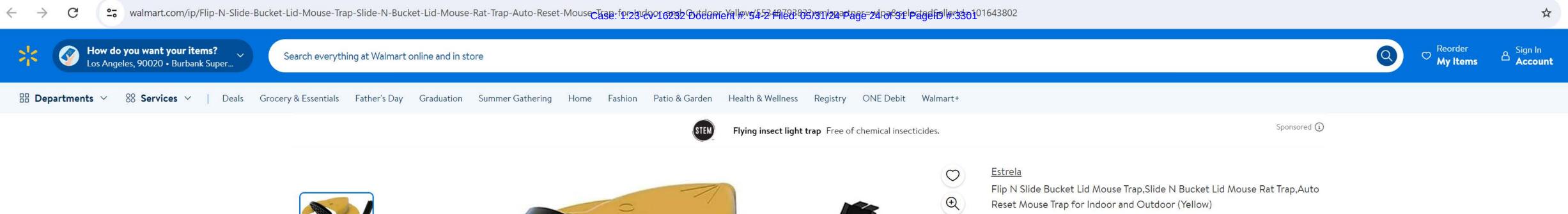
Traps

HECO ARMOR Wasp Traps, Outdoo...

★★★☆☆ 69

20% off Limited time deal

\$23<sup>99</sup> \$29.99 \rime



Popular items in this category

Best selling items that customers love

Tree 30-day returns

>

( > )

\$999 Price when purchased online (i)

Add to cart

How do you want your item?

Pickup

Not available

Sponsored

\$21.99

2-day shipping

Shipping

Arrives Jun 7

\$7.00

Delivery to Los Angeles, 90020

Sold and shipped by Estrela

View seller information

Free 30-day returns Details

Add to list

Delivery

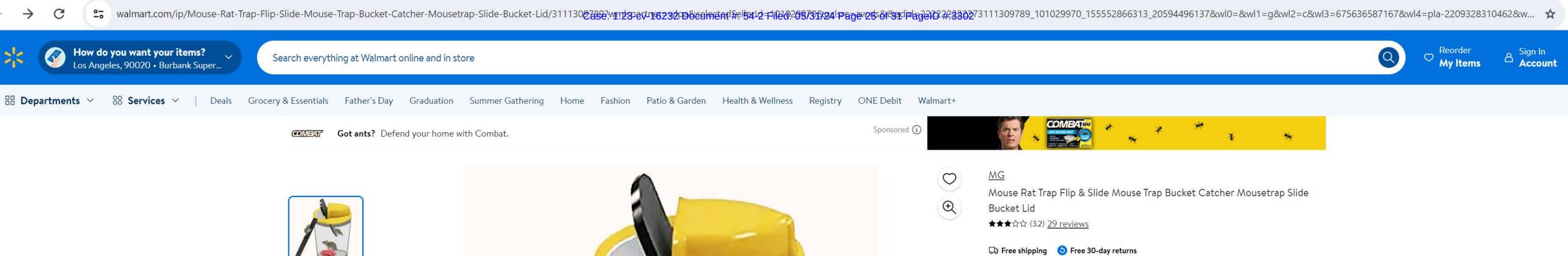
Not available

Add to registry

2 Pack Mouse Catchers Bucket Lid with

Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...

+ Add



\$995 Price when purchased online (i)

Add to cart

How do you want your item?

Shipping

Arrives May 31

Free

Delivery to Los Angeles, 90020

★★★☆ 103 seller reviews

View seller information

Free 30-day returns Details

Add to list

1

Pickup

Not available

Sponsored

\$37.71

★★★★☆ 134

2-day shipping

Sold and shipped by Alltech Devices, LLC | Pro Seller (1)

Delivery

Not available

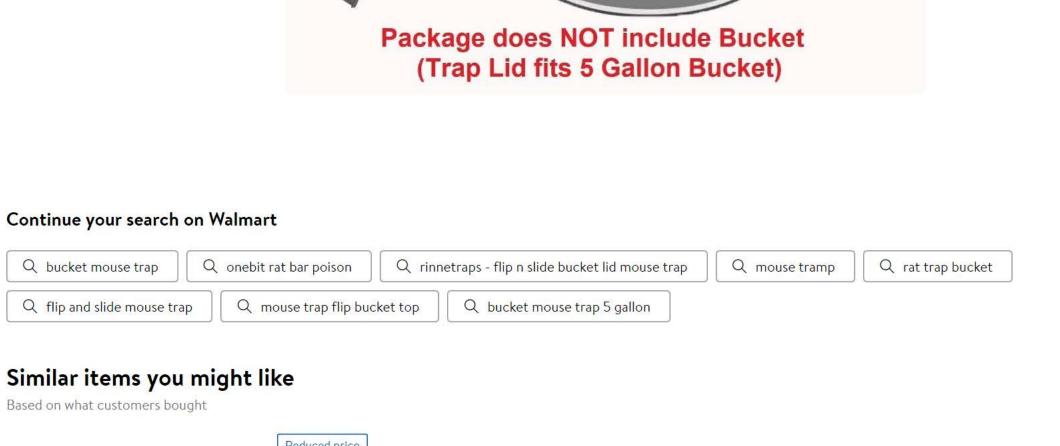
Add to registry

Oxgord Live Animal Trap Humane Catch &

Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large )...

+ Add













A Sign In Account

How do you want your items?
Los Angeles, 90020 • Burbank Super...

Search everything at Walmart online and in store

<

Bepartments Wellness Registry ONE Debit Walmart+



Flying insect light trap Free of chemical insecticides.















# **How This Trap Works**



Mice climb the provided ramp toward the bait located inside of the tunnel

The mouses weight will trigger the

platform to fall forward



Mice will inch out onto the counter weighted platform to eat the bait



The platform will then automatically reset for the next mouse

Flip N Slide Bucket Lid Mouse Trap, Slide N Bucket Lid Mouse Rat Trap, Auto Reset Mouse Trap for Indoor and Outdoor (Yellow)

Tree 30-day returns

\$999 Price when purchased online (i)

#### Add to cart









Sponsored (i)

Delivery to Los Angeles, 90020

- Sold and shipped by Estrela View seller information
- Free 30-day returns Details

#### Add to list

#### Add to registry

#### Sponsored \$21.99

2 Pack Mouse Catchers Bucket Lid with Upgraded Clear Box, 2 Entrances & Auto Reset, Reusable Humane Rat Catcher for...





2-day shipping

+ Add

# Popular items in this category

Best selling items that customers love









Search everything at Walmart online and in store







☆





0

















## Continue your search on Walmart



# Similar items you might like

Based on what customers bought









<u>Aegis</u>

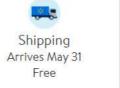
2x Mice Trap Reusable Smart Flip and Slide Bucket Lid Mouse Rat trap Auto

★★☆☆ (2.9) 7 reviews

\$1999 Price when purchased online (i)

#### Add to cart









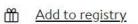
Sponsored (i)

Delivery to Los Angeles, 90020

Sold and shipped by Aegis Inc

★★★★ 84 seller reviews View seller information Free 30-day returns <u>Details</u>

Add to list





# Sponsored

HYEASTR Mouse Trap Bucket Flip Lid Mouse Rat Trap Bucket Lid Auto Reset Multi Catch Humane Rat Trap for Indoor...

3+ day shipping

+ Add

Search everything at Walmart online and in store





A Sign In Account



□ Departments ∨ 88 Services ∨ Deals Grocery & Essentials Father's Day Graduation Summer Gathering Home Fashion Patio & Garden Health & Wellness Registry ONE Debit Walmart+



Prevent bug bites Protection for every day.



**HYEASTR** 

0

HYEASTR Mouse Trap Bucket Lid (2 Pack) - Humane Flip and Slide Bucket Lid Mouse/Mice/Rat Trap, Auto Reset, Multi Catch Mice Trap Compatible with 5 Gallon Bucket for Indoor/Outdoor/Chicken Coop

★公公公公 (1.0) 1 review

\$1679 Price when purchased online (i)

#### Add to cart

## How you'll get this item:



Pickup Not available

Delivery Not available

Sponsored (i)

Los Angeles, 90020 Change

Arrives by Thu, May 30 | More options

Sold and shipped by HYEASTR STORE

★★★☆☆ 3 seller reviews View seller information Free 30-day returns <u>Details</u>

#### Add to list



#### \$37.71

Sponsored

Oxgord Live Animal Trap Humane Catch & Release Cage Cat Rabbit Rodents 2-Door Foldable Heavy Duty Trapping Kit (Large )...

★★★☆☆ 134

2-day shipping

+ Add



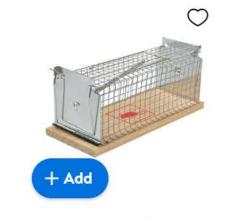


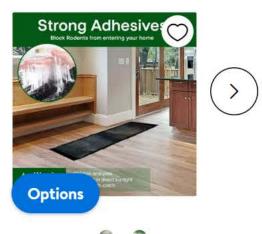
## Similar items you might like

Based on what customers bought









Sponsored (i)



A Sign In Account

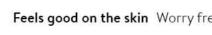


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Feels good on the skin Worry free protection.

















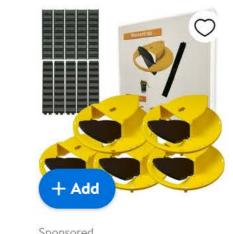


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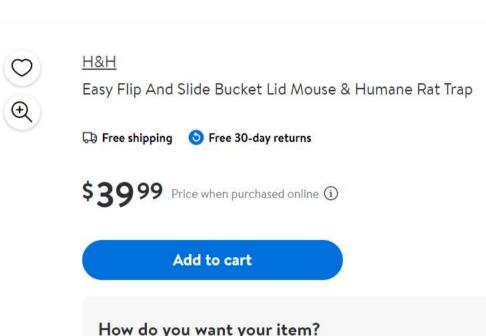
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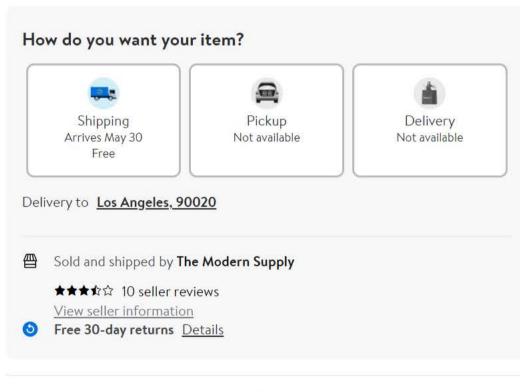


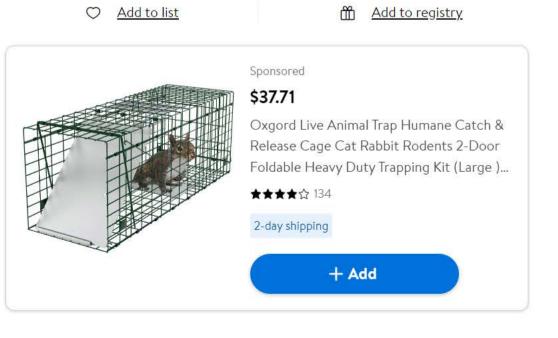


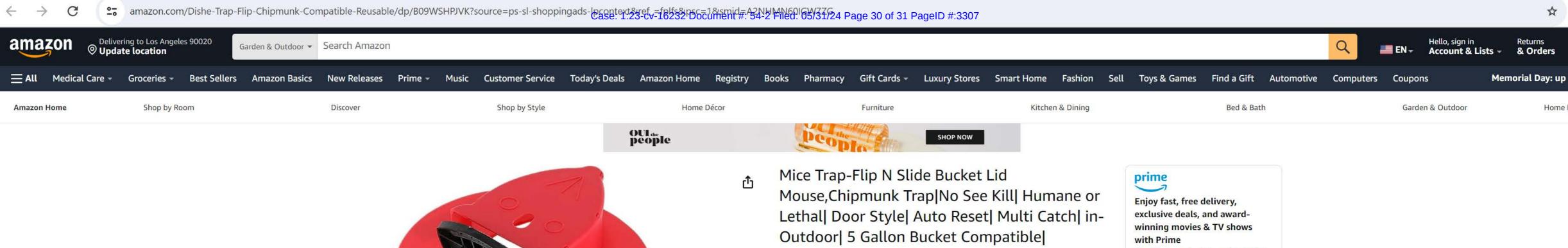


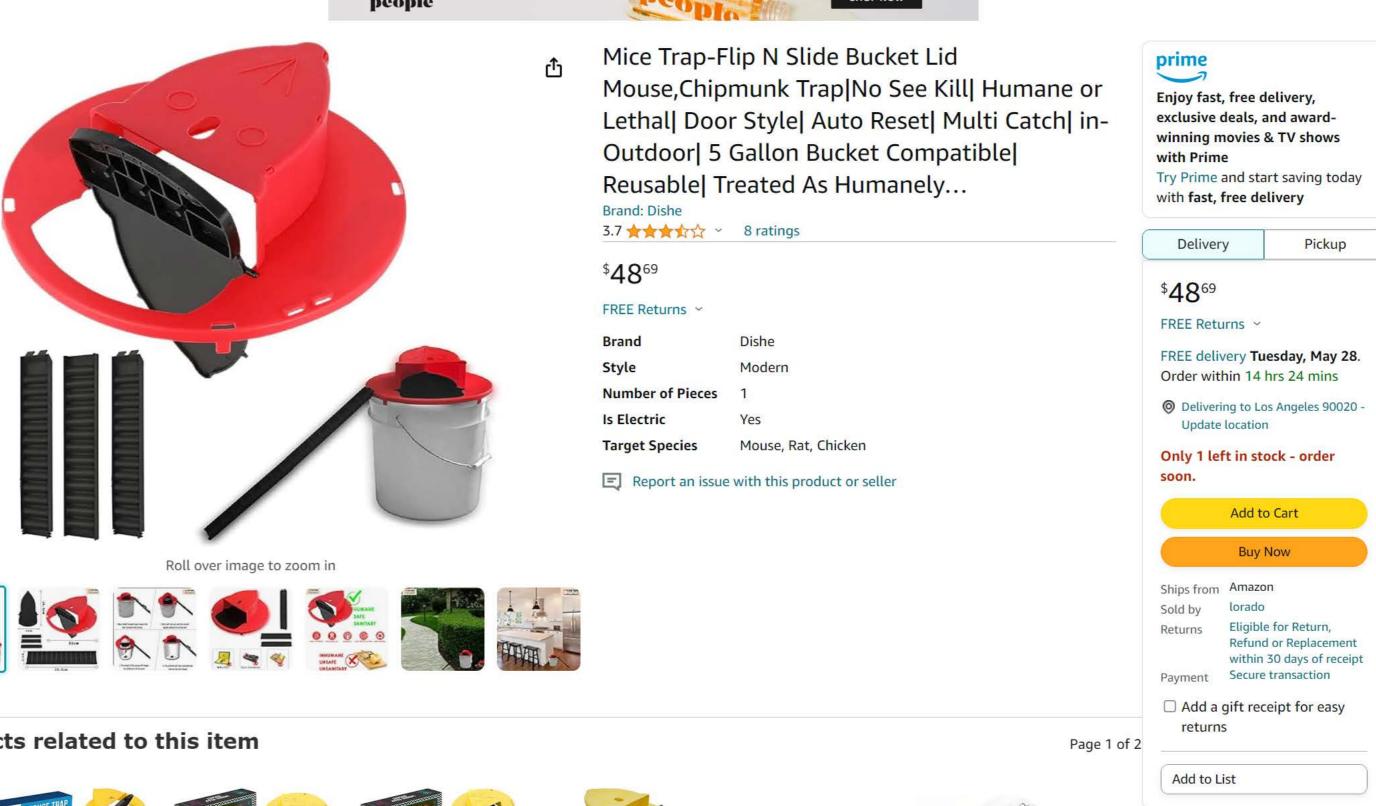












## Products related to this item



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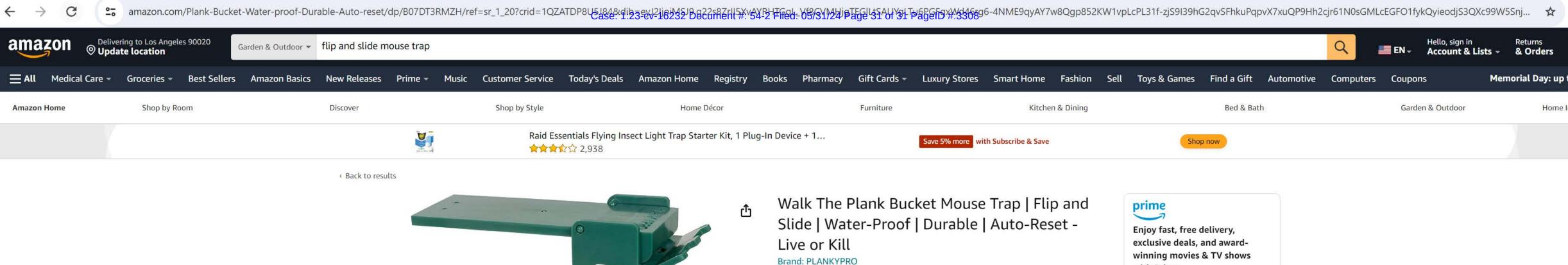
200PCS Barrel Snap Swivel Fishing Accessories, Premium Fishing Gear... 4.6

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Roll over image to zoom in















3.9 ★★★★☆ ~ 775 ratings

50+ bought in past month

-10% **\$17**<sup>99</sup>

List Price: \$19.99

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Item Package Quantity: 1

Color: Black

**PLANKYPRO** Brand Color Black Plank Style Material Plastic Number of Pieces Is Electric No **Target Species** Mouse, Rat

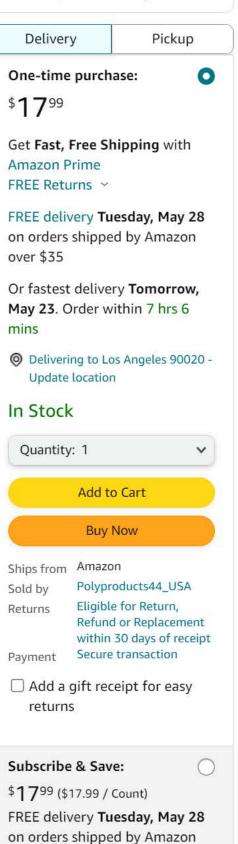
#### About this item

- AUTO RESET: The trap resets automatically. You can catch multiple mice at
- WATERPROOF: Unlike other traps in the market, our trap is made from durable waterproof plastic.
- POISON FREE: Simply use peanut butter or any other bait that can be stuck to the trap. Keeps your pets safe and out of danger.
- LIVE OR KILL: You have option of using the device as a live catch or to kill the mice. Use water in the bucket if you intend on not releasing the mice. Using fine sand or saw dust at the bottom prevents the mice from jumping out. Using taller bucket is help with the live catch.
- IMPORTANT (UNIVERSAL BODY): This plank included in this trap set is specifically calibrated for smaller mice. However a set including bigger plank is available for purchase. Additionally you can also just buy the bigger plank only if you already purchased the smaller trap set. The same UNIVERSAL BODY works with both plank.

#### **Additional Details**

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